

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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	:	
UNITED STATES OF AMERICA	:	<u>Protective Order For</u>
	:	<u>3500 Material</u>
- v. -	:	
	:	15 Cr. 769 (AJN)
YURI LEBEDEV and	:	
TREVON GROSS,	:	
	:	
Defendants.	:	
- - - - -	x	

ALISON J. NATHAN, District Judge:

WHEREAS the Government intends to produce to YURI LEBEDEV and TREVON GROSS, the defendants, materials in compliance with the Government's obligations under the Federal Rules of Criminal Procedure and Title 18, United States Code, Section 3500, as well as *Brady v. Maryland*, 373 U.S. 83 (1963), *Giglio v. United States*, 405 U.S. 150 (1972), and their progeny (referred to herein as "3500 Material");

WHEREAS, the Government desires to protect the information contained in the 3500 Material because such material identifies cooperating witnesses and contains information cooperating witnesses have provided to the Government, some of which also relates to ongoing prosecutions of other defendants as well as ongoing investigations;

WHEREAS YURI LEBEDEV, the defendant, by and through his attorneys Eric Creizman, Esq., and Melissa Madrigal, Esq.,

and TREVON GROSS, the defendant, by and through his attorneys Henry Klingeman, Esq., and Kristen Santillo, Esq., consent to the entry of this Order;

IT IS HEREBY ORDERED:

1. Copies of the 3500 Material produced by the Government in this action bear stamps with numbers beginning with the numbers 35__-__ or with a prefix noting the initials of the individual who is the subject of the notes or report;

2. 3500 Material disclosed to the defendants, or to the defendants' attorneys, during the course of proceedings in this action:

(a) shall be used by the defendants or their counsel only for purposes of this action;

(b) shall not be copied or otherwise recorded by the defendants or their counsel except for purposes of the defense of this action;

(c) shall be kept and maintained by the defendants and their counsel in a secure container and location;

(e) shall not be disclosed or distributed in any form by the defendants or their counsel except as set forth in paragraph 2(f) below;

(f) may be disclosed only by the defendants' counsel and only to the following persons (hereinafter "Designated Persons"):

- (i) investigative, secretarial, clerical, paralegal, and student personnel employed full-time or part-time by the defendant's counsel;
- (ii) potential witnesses; and
- (iii) such other persons as hereafter may be authorized by the Court upon a motion by the defendant; and

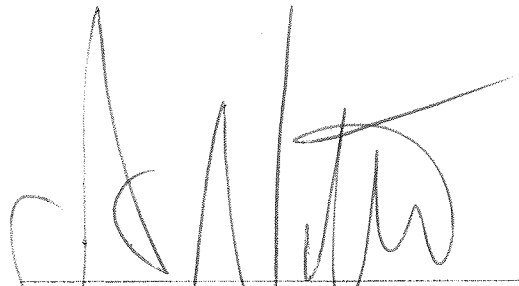
(g) shall be either (i) returned to the Government following the conclusion of this case, together with any and all copies thereof, or (ii) destroyed together with any and all copies thereof, with defendants' counsel verifying in writing to the Government that such destruction has taken place.

3. The defendants and their counsel shall provide a copy of this Order to Designated Persons to whom 3500 Material is disclosed pursuant to paragraph 2(f). Designated Persons shall be subject to the terms of this Order.

4. The provisions of this Order shall not be construed as preventing the disclosure of any information in any motion, hearing, trial, or sentencing proceeding held in this action, or to any judge or magistrate of this Court for purposes of this action.


IT IS SO ORDERED.

Dated: New York, New York
January 26, 2017



HONORABLE ALISON J. NATHAN
United States District Judge

AGREED AND CONSENTED TO:



ERIC CREIZMAN, ESQ.
MELISSA MADRIGAL, ESQ.
Attorneys for Yuri Lebedev

1/24/2017
DATE

HENRY KLINGEMAN, ESQ.
KRISTEN SANTILLO, ESQ.
Attorneys for Trevon Gross

DATE

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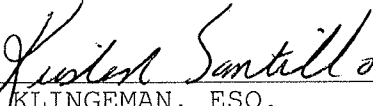
Dated: New York, New York
January __, 2017

HONORABLE ALISON J. NATHAN
United States District Judge

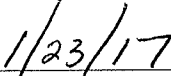
AGREED AND CONSENTED TO:

ERIC CREIZMAN, ESQ.
MELISSA MADRIGAL, ESQ.
Attorneys for Yuri Lebedev

DATE



HENRY KLINGEMAN, ESQ.
KRISTEN SANTILLO, ESQ.
Attorneys for Trevon Gross



DATE